

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

In re:

Algits Incorporated dba NinjaBe

Debtor

* * * * *

Case No. 21-13888

Chapter 11

* * * * *

CIT Bank, N.A.

Movant

v.

Motion for Relief from Stay

Algits Incorporated dba NinjaBe

Respondent

* * * * *

**DEBTOR'S RESPONSE AND CONSENT TO CIT BANK, N.A./MOVANT'S
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

Algits Incorporated dba NinjaBe, the Debtor, by and through his undersigned counsel,
hereby responds and consents to CIT Bank, N.A./Movant's Motion for Relief from the
Automatic Stay (Docket No. 39) and agrees to the immediate surrender of the subject equipment
described in Movant's Motion for Relief from the Automatic Stay.

Dated: August 2, 2021

Respectfully submitted,

/s/ Robert L. Kline, III

Robert L. Kline, III, #4357

5 Public Square, Suite 200

Hagerstown, MD 21740

240 347 4944

klinelawgroupllc@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of August, 2021, to the extent that the following
persons were not served electronically via the CM/ECF system, a copy of the foregoing was

mailed, via First-Class Mail, postage prepaid to all parties of interest listed on the Court's official mailing matrix and to the following parties through the ECF:

- **Hugh M. (UST) Bernstein** hugh.m.bernstein@usdoj.gov
- **Robert L. Kline** klinelawgroupllc@gmail.com
- **Craig Palik** cpalik@mhlawyers.com,
dmoorehead@mhlawyers.com;cpalik@ecf.inforuptcy.com;kolivercross@mhlawyers.com
- **Kristen B. Perry** kperry@howardcountymd.gov
- **Joseph Michael Selba** JSelba@tydingslaw.com
- **US Trustee - Baltimore** USTPRegion04.BA.ECF@USDOJ.GOV
- **Christopher S. Young** cyoung@btlg.us,
sphillips@btlg.us;hconnolly@btlg.us;edonohue@btlg.us;hyeung@btlg.us;klohmeyer@btlg.us

/s/ Robert L Kline, III
Robert L Kline, III